

1 JONATHAN W. CARLSON, ESQ.
Nevada Bar No. 10536
2 *jcarlson@mbswc.com*
PAMELA L. McGAHA, ESQ.
3 Nevada Bar No. 8181
pmcgaha@mbswc.com
4 AMANDA A. EBERT, ESQ.
Nevada Bar No. 12731
5 *amanda.ebert@mccormickbarstow.com*
McCORMICK, BARSTOW, SHEPPARD,
6 WAYTE & CARRUTH LLP
8337 West Sunset Road, Suite 350
7 Las Vegas, NV 89113
Telephone: (702) 949-1100
8 Facsimile: (702) 949-1101
Attorneys for Defendant
9

10 UNITED STATES DISTRICT COURT

11 DISTRICT OF NEVADA

13 PATRICIA V. EKES, an individual, and
EDWARD L. EKES, an individual,

14 Plaintiffs,

15 v.

16 GEICO GENERAL INSURANCE
17 COMPANY, and DOES I-X, and ROE
CORPORATIONS I-X, inclusive,

18 Defendants.
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CASE NO. 2:24-cv-00919-RFB-EJY

PROPOSED STIPULATION AND ORDER
TO CONTINUE DISCOVERY DEADLINE
DATES (SECOND REQUEST)

20 Defendant GEICO GENERAL INSURANCE COMPANY, by and through its attorneys of
21 record of the law firm McCORMICK, BARSTOW, SHEPPARD, WAYTE & CARRUTH LLP, and
22 Plaintiffs PATRICIA V. EKES and EDWARD L. EKES, by and through their attorneys of record
23 of the HANRATTY LAW GROUP, hereby file this Stipulation and Order to Continue Discovery
24 Deadline Dates (First Request), specifically seeking to extend the discovery deadline and dates
25 related thereto by one-hundred twenty days (120) days.

26 IT IS HEREBY STIPULATED AND AGREED between the parties to extend the discovery
27 deadline of May 13, 2025; the February 12, 2025 deadline to amend pleadings or add parties; the
28 initial disclosure of experts deadline of March 14, 2025; the rebuttal expert disclosure deadline of

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April 14, 2025; the dispositive motions deadline of June 12, 2025; and the joint pre-trial order deadline of July 13, 2025. In accordance with Local Rule 26-4, the parties state as follows:

I. DISCOVERY COMPLETED BY THE PARTIES:

The FRCP 26(f) conference between the parties in this matter was held on June 13, 2024. Defendant served its initial disclosure on July 24, 2024. Defendant has propounded interrogatories, requests for admissions, and requests for production of documents.

Most importantly, the parties attended a mediation on January 6, 2025. The parties made significant progress towards resolution and have scheduled a follow up mediation for March 13, 2024 with Howard Russell, Esq. as the mediator. Because of the upcoming mediation date the parties wish to continue the deadlines in this matter in order to avoid expert retention and all other discovery that will prove moot should the case fully resolve at mediation.

II. DISCOVERY WHICH REMAINS TO BE COMPLETED:

Depositions: The parties anticipate proceeding with depositions of the parties, pertinent witnesses, and potentially medical providers thirty (30) to sixty (60) days following the exchange of discovery responses.

Experts: The parties also intend to disclose experts and further seek to depose said experts after disclosure.

III. REASON WHY DISCOVERY WAS NOT SATISFIED OR COMPLETED WITHIN THE TIME LIMIT SET BY THE DISCOVERY PLAN:

The parties have begun working diligently towards resolving this case. The parties agree that one more round of mediation shall likely be sufficient to get the case resolved and dismissed without further use of their, or the Court's, resources. The parties therefore seek this Court's permission to obtain one final extension of discovery deadlines to hopefully get this matters resolved.

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The parties therefore respectfully request an additional one-hundred twenty (120) days to allow for the parties to continue with discovery, including depositions and the exchange of experts, in the event the attempt the parties' attempt for early resolution is unsuccessful.

IV. GOOD CAUSE EXISTS TO GRANT THE REQUESTED EXTENSION

The instant stipulation is submitted within the timeframe outlined by LR II 26-4. As stated above, in light of the parties seeking to resolve this matter at mediation, a one-hundred twenty (120) day extension of the discovery cut-off date and all deadlines related thereto is a reasonable amount of time to proceed.

V. THE CURRENT SCHEDULE FOR COMPLETION OF ALL REMAINING DISCOVERY:

The parties request that the pertinent discovery deadlines set forth in the Court's Scheduling Order be continued one-hundred twenty (120) days, as follows:

A. ESTIMATE OF TIME REQUIRED FOR DISCOVERY: Pursuant to Local Rule 26-1(b)(1), and with the Court's approval, discovery shall be completed on or before **September 12, 2025**.

B. DEADLINE TO AMEND PLEADINGS OR ADD PARTIES: Unless otherwise stated herein, and the Court so orders, the date to amend pleadings or add parties shall be ninety (90) days before prior to the discovery cut-off date, but not later than **June 13, 2025**.

B. EXPERT DISCLOSURES: Unless otherwise stated herein, and the Court so orders, the date for the parties to exchange initial expert witness disclosures shall be sixty (60) days prior to the discovery cut-off date, but not later than **July 14, 2025**, and rebuttal expert disclosures shall be thirty (30) days prior to the discovery cut-off date, but not later than **August 13, 2025**.

C. DISPOSITIVE MOTIONS: Unless otherwise stated herein, and the Court so orders, the date for filing dispositive motions shall be thirty (30) days after the discovery cut-off date, but not later than **October 13, 2025**.

PROPOSED STIPULATION AND ORDER
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DATES (FIRST REQUEST)
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D. PRETRIAL ORDER: Unless otherwise stated herein, and the Court so orders, the joint pretrial order shall be filed thirty (30) days after the date set for filing dispositive motions, but not later than **November 13, 2025**.

DATED this 21st day of February, 2025

HANRATTY LAW GROUP

By /s/ Kevin M. Hanratty
KEVIN M. HANRATTY, ESQ.
Nevada Bar No. 7734
Attorneys for Plaintiffs

DATED this 21st day of February, 2025

McCORMICK, BARSTOW, SHEPPARD,
WAYTE & CARRUTH LLP

By /s/ Jonathan W. Carlson
JONATHAN W. CARLSON, ESQ.
Nevada Bar No. 10536
Attorneys for Defendant

IT IS SO ORDERED.

DATED this 21st day of February, 2025


UNITED STATES MAGISTRATE JUDGE

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